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VIA EMAIL AND U.S. MAIL

December 10, 2009

Sustainable Communities Planning Grant and Incentives Program
c/o The Department of Conservation
Office of Sustainability
801 K Street, MS 24-01
Sacramento, CA 95814

Dear Sir/Madame:

Re: Comments on the Draft Grant Guidelines and Application for the Sustainable Communities Planning Grant and Incentives Program

The City of Los Angeles appreciates the opportunity to review and provide comments regarding the draft guidelines and application for the Sustainable Communities Planning Grant and Incentives Program to be funded under Proposition 84. We are very excited about the opportunities that this program will provide and want to work with you to make the program as effective as possible. To this end we would like to make the following suggestions:

1. Streamline the application process by establishing a 2-phase process. Given the very high need for planning resources, it is very likely that you will receive hundreds of applications from across the State. A 2-phase application process should be implemented which first screens for high quality proposals and then evaluates only those that pass the first phase and complete a full application.

Phase 1 is a call for proposals that requires a one-page narrative. Text beyond one page would not be read, and no supplemental material is submitted. The narrative should include: project description; how the project meets the Strategic Growth Council requirements and priorities; the scale of impact (i.e., local vs. regional, or number of persons impacted); amount of funding request (i.e., provide a range of increments, such as \$100,000-250,000, \$250,000-500,000, etc., from which the applicant chooses). These proposals are evaluated, and only those that meet eligibility requirements and project quality standards are selected to proceed to the second phase.

Phase 2 is a complete application, submitted by only those proposals that passed Phase 1.

This process has many benefits and advantages. A one-page narrative allows evaluators to immediately and easily assess the quality of a project and how well a project meets requirements and priorities. Second, evaluators can compare similar projects from different applicants more efficiently and cull the highest quality projects from among them. Third, this assists evaluators in ferreting out the projects of greatest merit. Lastly, and perhaps most importantly, time and resources are reduced for applicants and evaluators alike, as very lengthy and complex application materials are only prepared for those projects that are of the highest quality and merit.

2. Establish a “Local” grant program and a “Regional” grant program within the planning grant program. To recognize the different purposes and to acknowledge the importance of both local-level planning and regional-level planning, the planning grant program should establish two funding pools, one for local-level proposals and one for regional-level proposals, such that each type of proposal competes against like proposals and a balance of both types of proposals are sure to be funded across the State. It is critical to fund both local and regional plans in order to support the mandate of SB 375, which is currently unfunded. In addition, the role of regional planning and of regional planning agencies (MPOs and COGs) could be strengthened by having the MPO/COG for a region review and score local proposals for consistency with regional plans and SB 375 objectives.

3. Reduce the application materials. The burden on applicants and evaluators alike can be reduced significantly by omitting some narrative requirements within the application. The following are a few suggestions toward this end.

The “Step 1: Eligibility Requirements” narrative (page 10) is redundant and can be omitted. The information sought by these questions can be ascertained from responses to other questions and through supplemental material. The eligibility screening should be accomplished by evaluators considering the overall materials. Furthermore, if a 2-phase process is established, the vast majority of proposals will likely meet the eligibility requirements. Thus, specific questions addressing eligibility are redundant.

Some of the material and information required as part of the application could be obtained following a funding award, as it is not necessary for assessing project eligibility or quality. This will lessen the burden on applicants and evaluators, alike. For example, the requirement to identify metrics for all objectives could be a requirement of a final grant agreement. The accountability sought by such information is important. Thus, it is reasonable to make it a requirement that feasible and realistic metrics be identified and included in the grant agreement and that funding could ultimately be denied if such metrics are not identified and agreed to by the applicant in the grant agreement. Similarly, the Scope of Work form (Appendix K on page 36) does not need to include a column for performance measures. In addition, this form includes a column for “implementation schedule” and a column to identify the completion date. These columns seem redundant with the requirement to provide a timeline (Appendix J on page 35), and should not be required twice.

4. Clearly state the requirement for consistency with a Regional Plan. There are various references to proposals being consistent with regional plans (Part II on page 5 and throughout). It would be helpful to applicants if the guidelines clearly stated that relevant regional plans must be identified and that the proposal must indicate how it is consistent with each of these regional

plans. Please clarify what constitutes a Regional Plan. For example, Appendix M does not appear to include the plans referred to in the “Regional Plan” definition in the Glossary. It would be helpful to add more discussion to the definition of “Regional Plan” in the Glossary and to Appendix M in order to clarify this, as well as within the text of the guidelines in Part II and at the top of page 6 (and this paragraph on page 6 might be moved from part III to Part II).

5. Provide guidance to applicants regarding Additional Requirements. Some discussion and description of each of the eleven Additional Requirements (Part III on page 5) would help the applicant understand the intent and better address objectives of these requirements. At a minimum, it would be helpful to identify the source of each requirement (i.e., the legislation where it originates).

6. Provide guidance to applicants regarding Priority Considerations. Some discussion and description of each of the six Priority Considerations (Part IV on page 6) would help the applicant understand the intent and better address objectives of these. This would also provide for equity and fairness in the evaluation and scoring of proposals. For example, per number 4, a proposal that includes additional funds from other sources can be awarded points. Such other sources may include in-kind services and volunteer services; however, how to place a monetary value on these additional sources is not explained. Is there a standard that all applicants should use for valuing such additional sources? In addition, additional discussion regarding the meaning of “co-benefits” under Priority Consideration number 6 would help the applicant identify such benefits and better address the objectives of this priority.

7. Provide guidance to applicants regarding “Community Support” and Organizational Capacity. Proposals will be assessed and awarded points for the strength of organizational capacity exhibited (Part VI on page 7). On page 7, “community support” is identified as part of this assessment, however there is no discussion of what is expected of the applicant regarding community support and there is no specific question regarding “community support” which would elicit the applicant’s strength in this area (page 15). If community support is part of the points, it would be helpful to identify what specifically to address and where in the application.

8. Provide additional information for some terms in the Glossary.

Disadvantaged Community (page 18) – This definition is based upon the “median household income” and it would be helpful to clarify the source of these figures (i.e., HCD and/or a particular website?). It would also be helpful to describe how an applicant determines the boundaries of such a community.

Infill and Compact Development – Although referenced as being in the Glossary (see page 5), these terms are not included. It would be helpful to have a definition.

Regional Plan – see comments under item #1, above.

9. Clearly state all criteria to be used in determining funding awards. Applicants must have full knowledge of how proposals will be evaluated and funds awarded in order for the evaluation process to be fair and equal. Therefore, clarity should be provided regarding the following elements of the proposal evaluation and funding awards process.

A. Geographic distribution of awards (Part V on page 6): Reference is made in the draft text that geographic distribution might be a factor in determining what proposals are awarded funds. What standards will be used to make geographic choices regarding selected proposals and amount of funds awarded? Perhaps a standard can be established that sets aside a minimum percentage of the funds in the funding round for the geographic area(s) of the State with the greatest greenhouse gas emissions. This will facilitate the implementation of projects where the need is greatest.

B. Environmental Justice (Part V on page 6): While a definition is included in the Glossary, the standard(s) by which this would be applied to determine a funding award is not delineated. Perhaps a standard can be established that provides bonus point(s) to projects that reduce GHG emissions in communities that experience greater detrimental environmental impacts compared to surrounding communities or the region.

C. Other Factors (Part V on page 6): If factors other than those identified and described are to be applied in making funding award decisions, those factors should be identified in the application materials.

D. Points for Additional Requirements (Part VI on page 7): While there is a potential to obtain a total of 55 points for satisfying "Additional Requirements," it is not clear how points will be awarded regarding each of the eleven Additional Requirements. For consistency, up to 5 points should be available for each of the eleven Additional Requirements, as is proposed for the six Priority Considerations.

10. Add Impact on Reducing Greenhouse Gas Emissions as a criterion in making funding decisions. Proposals that achieve the greatest reduction in greenhouse gas emissions should be rewarded. This is a critical component of SB 375 implementation and an essential aspect of sustainable communities. Therefore, proposals that reach a greater number of people and achieve a greater reduction in GHG emissions should be awarded greater points in the proposal evaluation system.

11. Allow more than one application per agency. The draft guidelines and application do not identify if an applicant may submit more than one proposal in the same funding cycle. This opportunity should be available, especially given that large jurisdictions undertake many planning efforts concurrently in different parts of the jurisdiction and all need the support of this program.

Thank you in advance for your consideration of our comments and questions. We are interested in working with you and are available to discuss this. Please do not hesitate to contact me at (213) 978-1272 or via email at Jane.Blumenfeld@lacity.org.

Sincerely,



Jane Blumenfeld
Acting Deputy Director